

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Arkansas Cable Telecommunications
Association; Comcast of Arkansas, Inc.;
Buford Communications I, L.P. d/b/a
Alliance Communications Network;
WEHCO Video, Inc.; TCA Cable
Partners d/b/a Cox Communications,
and Cebridge Acquisition, L.P, d/b/a
Suddenlink Communications

Complainants,

v.

Entergy Arkansas, Inc.,

Respondent

EB Docket No. 06-53

EB-05-MD-004

RECEIVED

JUL 20 2006

Federal Communications Commission
Office of Secretary

To: Office of the Secretary

Attn: The Honorable Arthur I. Steinberg
Administrative Law Judge

**ENTERGY ARKANSAS, INC.'S RESPONSES TO COMPLAINANT
ARKANSAS CABLE TELECOMMUNICATIONS ASSOCIATION'S
FIRST SET OF INTERROGATORIES**

Entergy Arkansas, Inc. ("EAI"), for its response to complainant Arkansas Cable
Telecommunications Association's ("ACTA") first set of interrogatories, states as follows:

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GENERAL OBJECTIONS

EAI's responses are subject to, qualified by, and limited by the following General Objections which apply to each specific interrogatory as if incorporated and set out in full in response to each.

1. EAI generally objects to each interrogatory to the extent it requires EAI to provide information not within its possession, custody, or control.
2. EAI generally objects to any interrogatory that calls for information not within its present knowledge or which seeks to require EAI to offer a narrative of its case.
3. EAI generally objects to the interrogatories to the extent that they are unreasonably cumulative or duplicative and to the extent that the information requested is already within the possession of Complainants or is otherwise obtainable from some other source that is more convenient, less burdensome, or less expensive.
4. EAI generally objects to the interrogatories to the extent that they seek discovery of information that is not relevant to any claim or defense raised by Complainants or EAI and/or where the burden or expense of the proposed discovery would outweigh any benefit to ACTA of the discovery.
5. EAI generally objects to the interrogatories to the extent that they seek discovery of pure legal conclusions or contentions without any application to specific facts. Further, to the extent that any interrogatory seeks discovery of EAI's legal contentions in relation to specific facts, EAI objects to the interrogatory as being premature.
6. EAI generally objects to ACTA's interrogatories to the extent that they seek information or production of documents protected by the attorney-client privilege, the work

product doctrine, the party communication privilege, or any other legally recognized privilege, immunity, or doctrine.

7. EAI generally objects to ACTAs' interrogatories to the extent that they seek information or documents protected from disclosure by a third party confidentiality agreement, statute, regulation, administrative order, or case law.

8. EAI generally objects to ACTA's interrogatories insofar as they seek confidential and/or proprietary information. EAI will respond or produce documents or other materials which contain confidential and/or proprietary information subject to the entry of a protective order governing use of such documents and information by the Administrative Law Judge.

9. EAI generally objects to any instruction, definition, interrogatory, or request to the extent it attempts to impose obligations on EAI greater than those established by the rules of the Federal Communications Commission, 47 C.F.R. §§ 1.311 through 1.325.

10. EAI submits these responses and will respond to ACTA's interrogatories without conceding the relevancy or materiality of the subject matter of any interrogatory or request or document, and without prejudice to EAI's right to object to further discovery, or to object to the admissibility of any additional proof on the subject matter of any document or response, at the time of the formal hearing of this proceeding before the Administrative Law Judge. EAI reserves the right to supplement any response herein at any time and in accordance with the Administrative Law Judge's order issued April 20, 2006, FCC 06M-09.

11. EAI's responses below that it will produce certain documents in response to interrogatories should be taken not as representations that such documents exist but as an undertaking to locate and produce relevant, non-privileged documents, if they exist and can be found.

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

1: Please identify each person who assisted in the formulation of the answers to each interrogatories in this First Set of Interrogatories. Please provide each person's name, address, and official position or relationship with the party to whom the interrogatories are directed.

ANSWER: Subject to and without waiving the above general objections, EAI responds as follows: Wm. Webster Darling, Janan Honeysuckle, and additional counsel for EAI.

2: Please list the name, address, and telephone numbers of all persons or entities who are believed or known by you, your agents or attorneys to have any knowledge or information concerning any assertion made in the April 19, 2005 Entergy Response filed in this action, or any fact underlying the subject matter of this action, and please specify the subject matter about which such persons have knowledge.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows:

(1) EAI identifies all individuals that provided declarations attached to EAI's April 19, 2005 response.

(2) The subject matter of such persons' knowledge is set out in their declarations.

3: Please identify all individuals who you plan to call as an expert witness in the case. Please state as to each such witness the matter upon which the witness is expected to testify.

ANSWER: Subject to and without waiving the above general objections, EAI responds as follows:

(1) EAI has not determined who will or may be called to testify as an expert witness in this case. EAI will supplement. Subject to and without waiving the previous response, EAI anticipates calling Lonnie Buie as an expert witness.

(2) See response to (1) above. Responding further as to Lonnie Buie, see the declaration of Lonnie Buie previously produced to complainants.

4: Please identify all individuals employed by Entergy's contractor USS who have performed audit or inspection services related to Complainants' cable television facilities, or any individuals employed by USS who have performed underlying administrative and support functions associated with such services from the year 2000 to the present.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows to identify the individuals who may be contacted through Wm. Webster Darling, 425 W. Capitol Avenue, 27th Floor, Little Rock, Arkansas 72201; (501)377-5838:

Tom Bloodworth	Carl Worthington	John D. Tabor
Bettye K. Watts	Zack Ballenger	Ann C. Henderson
Brenda Lewis	Damon Rodgers	Myron Welch
Linda F. Andrews	James Brett Bohannon	David Brent Bozell
Jennifer Baker	Terrence Wehrle	Heidi Rochelle Johnson
Cathy Arnett	Velda Kay Milam	Bryan Wade Wilson
Wil Arnett	Jeffrey Ratliff	Lindsey Gail Taylor
Sherry Bush	Sandra Scheuermann	Carmen Julia Wagoner
Bobby McBride	William Nesmith	Jose Perez
Robert Arnold	Alex Prosper	Naomi R. Wharton
Don McPhail	Jerry Wayne Edmonson	Regina Kay Rihani
John Brozak	Casey Morgan Jones	Kathleen Ton Huyen
Troy Platt	Nicholas Bryan Jones	Deana Joy Daniels
John Wilbur Avery	Padrum Antoine Panbechi	Ernest C. Gregory, Jr.
John Curtis Gurley, III	Donna Lorene Brown	John Clinton Latham
Jimmy Hill	Debra Sue Edmonson	Charles Brent Lewis

Daniel Scott Stickford	Jeffrey Scott Crissey	Glenn Allen Parrish
Johnny Ray Cates	Russell David Buckner	Timothy Edward Chapman
Michael Thomas Blythe	Casey Chad Bush	Jennifer Lee Gurley
Randy Dale Ison	Cody Lee Bush	Tiffany Marie Wharton
Thomas A. Young	Justin Edward Daniels	Roy Aaron Young
Henry James Voss	Kenneth Wayne Darling	Jeffery Michael Rosinbaum
John Jerry Ison	Jack Timmons Brock	Linda Kay Thompson
David Dent	Amanda Lee Burnum	Adrienne Nicole McDonald
Jefferson Ray Perry	Anthony Lamar Wagoner	Brent Allen Young
Susan Arnett	Gwendolyn Ledana Spann	Eric Trenton Davis
Hugh Huckeba, Jr.	William Timothy Weidenbach	

5: Please identify all individuals who have been employed by Entergy, its affiliates, subsidiaries or parent companies working in the area of joint use of Entergy poles, conduits and rights-of-way from 1996 to present. Your answer should include all individuals, whether physically located in Arkansas or not, whose work relates to poles, conduits and right-of-way in Arkansas and should state in what capacity their work relates to poles, conduits and rights-of-way in Arkansas, as well as the start and end dates (if applicable) of their employment by Entergy. If any such individuals subsequently were employed by a contractor used by Entergy to assist Entergy in the areas of outside plant design, construction, or maintenance; design implementation, enforcement of design implementation, enforcement of engineering and safety standards for outside plant; or joint use, please specify the identities of such individuals and the contractors by whom they were employed.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows to identify the individuals who should only be contacted through Wm. Webster Darling, 425 W. Capitol Avenue, 27th Floor, Little Rock, Arkansas 72201; (501)377-5838:

EAI understands this interrogatory to seek the identities of individuals employed by EAI who were/are directly responsible for joint use of EAI's facilities within the time referenced.

Based upon this understanding, EAI identifies the following individuals:

Name	Area of Responsibility & Dates
Alford, Scott	Sr. Engineering Associate 1996 – 1999
Bass, Carroll	Sr. Engineering Associate 1996 – 1999
Bettis, Gary M	Manager, Area Design 1999 -
Castleberry, Troy	Distribution Services, Manager
Craig, Don	Area Design Supervisor 1996 - 1997
Frost, Roy	Senior Engineer 1996 - 1997
Harrell, Wayne	Manager, Area Design 1997-
Hulon, Jeff	Manager, Engineering 1997 - 2000
Inman, David	Joint Use Administrator 2001 -
Jordan, Michael Scott	Manager, Area Design 1997- 2000
Lamkin, Gary L	Manager, Engineering 1997 -
Lovell, James	Supervisor, Area Design 1997
Luther, William	Supervisor, Area Design 1996 - 1997
McElhanon, Graham	Manager, Engineering 1996 - 1997
Neumeier, Bernard	Manager, Area Design 1999 -
Osborne, Misty	Joint Use Coordinator 1999 -
Pennington, Carol	Joint Use Coordinator 2005 -
Caldwell, Rodney	Sr Engr Associate 1996 -
Taylor, James Dennis	Supervisor, Area Design 1996 -1997
Thompson, Lucindy	Joint Use Coordinator 2000 -
Welch, Brad	Joint Use Coordinator 1999 - 2005
Willems, Michael	Area Design Manager 1997 -
Boyd, Carma	Joint Use Administrator 1996 - 2001
Carpenter, Danny	Manager, Area Design 1997- 2000
Pennington, Tom	Supervisor, Area Design 1996 -1997
Wells, Eddie	Manager, Engineering 1996 - 97

6: Please identify all individuals who were involved in any way with Entergy's decision to retain USS.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows to identify the individuals who should only be contacted through Wm. Webster Darling, 425 W. Capitol Avenue, 27th Floor, Little Rock, Arkansas 72201; (501)377-5838:

EAI understands this interrogatory to seek the identities of individuals employed by EAI who were materially involved in EAI's decision to retain USS. Based upon this understanding, EAI identifies Gary Bettis, Gary Lamkin, P.J. Martinez, and James Lovell.

7: Please identify all individuals who participated in any way in the storm recovery damage case before the Arkansas Public Service Commission, (AR PSC Docket No. 01-296-U) discussed at footnote 2, pages 4-5 of Entergy's April 19, 2005, Response.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows to identify the individuals who should only be contacted through Wm. Webster Darling, 425 W. Capitol Avenue, 27th Floor, Little Rock, Arkansas 72201; (501)377-5838:

EAI understands this interrogatory to seek the identities of individuals employed by EAI who materially participated in the storm recovery damage case before the Arkansas Public Service Commission, (AR PSC Docket No. 01-296-U). Based upon this understanding, EAI

identifies Steven K. Strickland, Dennis A. Lytle, Hugh T. McDonald, J. David Wright, Gina M. Morello, Gordon D. Meyer, and Andrew P. Frits.

8: Please identify all individuals who attended presentations or meetings at which USS discussed its functions, services, rates pricing and scope of work. Your response should contain the dates and locations of all such meetings.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it lacks temporal scope, is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows:

EAI understands this interrogatory to seek the identities of individuals known to EAI who attended presentations or meetings at which USS discussed its functions, services, rates and scope of work for services related to EAI's facilities. Based upon this understanding, and on information and belief, EAI states there was an initial meeting on October 8, 2001 attended by Wil Arnett, Jimmy Cox, and Tom Jackson of USS. On further information and belief, the EAI personnel at this meeting included Gary Lamkin, Gary Bettis, and David Inman. The purpose of the meeting was a presentation by USS concerning its services. These individuals should only be contacted through Wm. Webster Darling, 425 W. Capitol Avenue, 27th Floor, Little Rock, Arkansas 72201; (501)377-5838.

9: Please identify all individuals who are or have been responsible for, or who otherwise participate or have participated in the development, implementation and enforcement of engineering, design and construction standards for communications facilities on Entergy poles for the years 1996 through the present.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly

broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows to identify the individuals who should only be contacted through Wm. Webster Darling, 425 W. Capitol Avenue, 27th Floor, Little Rock, Arkansas 72201; (501)377-5838:

EAI understands this interrogatory to seek the identities of individuals employed by EAI or otherwise within the control of EAI who were primarily responsible for development, implementation, and enforcement of engineering, design and construction of communications facilities on EAI poles within the time referenced. Based upon this understanding, EAI identifies the following individuals:

Name	Area of Responsibility & Dates
Bettis, Gary M.	Manager, Area Design 1999
Craig, Don	Area Design Supervisor 1996 – 1997
Frost, Roy	Senior Engineer 1996 – 1997
Glancy, Joseph M.	Manager, Technical Services
Harrell, Wayne	Manager, Area Design 1997
Hickman, James R.	Manager, Distribution Standards & Engineering Services
Hulon, Jeff	Manager, Engineering 1997 – 2000
Jordan, Michael Scott	Manager, Area Design 1997 - 2000
Lamkin, Gary L.	Manager, Engineering 1997
Lovell, James	Supervisor, Area Design 1997
Luther, William	Manager, Distribution Standards & Engineering Services
McElhanon, Graham	Manager, Engineering 1996 – 1997
Neumeier, Bernard	Manager, Area Design 1999
Soleibe, Jose Demis	Manager, Distribution Standards & Engineering Services
Taylor, James Dennis	Supervisor, Area Design 1996 – 1997
Willems, Michael	Area Design Manager 1997
Carpenter, Danny	Manager, Area Design 1997 – 2000
Pennington, Tom	Supervisor, Area Design 1996 – 1997
Wells, Eddie	Manager, Engineering 1996 – 1997

10: Please identify all individuals who are or have been responsible for, or who otherwise participate or have participated in the development, implementation and enforcement of engineering, design and construction standards (which includes post-construction inspections and quality control) for electric facilities placed on Entergy poles for the years 1996 through the present.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows to identify the individuals who should only be contacted through Wm. Webster Darling, 425 W. Capitol Avenue, 27th Floor, Little Rock, Arkansas 72201; (501)377-5838:

EAI understands this interrogatory to seek the identities of individuals employed by EAI or otherwise within the control of EAI who were primarily responsible for development, implementation, and enforcement of engineering, design and construction of facilities for EAI poles where Complainants are attached to such poles and within the time referenced. Based upon this understanding, EAI identifies the following individuals:

Name	Area of Responsibility & Dates
Bettis, Gary M.	Manager, Area Design 1999
Craig, Don	Area Design Supervisor 1996 – 1997
Frost, Roy	Senior Engineer 1996 – 1997
Glancy, Joseph M.	Manager, Technical Services
Harrell, Wayne	Manager, Area Design 1997
Hickman, James R.	Manager, Distribution Standards & Engineering Services
Hulon, Jeff	Manager, Engineering 1997 – 2000
Jordan, Michael Scott	Manager, Area Design 1997 - 2000
Lamkin, Gary L.	Manager, Engineering 1997
Lovell, James	Supervisor, Area Design 1997
Luther, William	Manager, Distribution Standards & Engineering Services

McElhanon, Graham	Manager, Engineering 1996 – 1997
Neumeier, Bernard	Manager, Area Design 1999
Soleibe, Jose Demis	Manager, Distribution Standards & Engineering Services
Taylor, James Dennis	Supervisor, Area Design 1996 – 1997
Willems, Michael	Area Design Manager 1997
Carpenter, Danny	Manager, Area Design 1997 – 2000
Pennington, Tom	Supervisor, Area Design 1996 – 1997
Wells, Eddie	Manager, Engineering 1996 – 1997

11: Please identify all individuals who are or have been responsible for, or who otherwise participate or have participated in pole-use matters with incumbent telephone companies, including but not limited to AT&T (formerly SBC or Southwestern Bell), Alltel and CenturyTel for the years 1996 through the present.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and is vague and ambiguous as to the term “pole-use matters.” Subject to and without waiving the above general and specific objections, EAI responds as follows to identify the individuals who should only be contacted through Wm. Webster Darling, 425 W. Capitol Avenue, 27th Floor, Little Rock, Arkansas 72201; (501)377-5838:

EAI understands this interrogatory to seek the identities of individuals employed by EAI or otherwise within the control of EAI who were materially involved in issues relating to the referenced companies’ use of EAI poles within the time referenced. Based upon this understanding, EAI identifies the following individuals:

Name	Area of Responsibility & Dates
Alford, Scott	Sr. Engineering Associate 1996 – 1999
Bass, Carroll	Sr. Engineering Associate 1996
Bettis, Gary M.	Manager, Area Design 1999
Castleberry, Troy	Distribution Services, Manager
Craig, Don	Area Design Supervisor 1996 – 1997
Frost, Roy	Senior Engineer 1996 – 1997
Harrell, Wayne	Manager, Area Design 1997
Hulon, Jeff	Manager, Engineering 1997 – 2000
Inman, David	Joint Use Administrator 2001
Jordan, Michael Scott	Manager, Area Design 1997 - 2000
Lamkin, Gary L.	Manager, Engineering 1997
Lovell, James	Supervisor, Area Design 1997
Luther, William	Supervisor, Area Design 1996 – 1997
McElhanon, Graham	Manager, Engineering 1996 – 1997
Neumeier, Bernard	Manager, Area Design 1999
Osborne, Misty	Joint Use Coordinator 1999
Pennington, Carol	Joint Use Coordinator 2005
Rodney Caldwell	Sr. Engineer Associate 1996
Taylor, James Dennis	Supervisor, Area Design 1996 – 1997
Thompson, Lucindy	Joint Use Coordinator 2000
Welch, Brad	Joint Use Coordinator 1999 – 2005
Willems, Michael	Area Design Manager 1997
Boyd, Carma	Joint Use Administrator 1996 – 2001
Carpenter, Danny	Manager, Area Design 1997 – 2000
Pennington, Tom	Supervisor, Area Design 1996 – 1997
Wells, Eddie	Manager, Engineering 1996 – 1997

12: Please identify all individuals who attended a meeting in Greenville, Mississippi on July 21, 2004 referenced in ¶ 24 of Jeff Gould’s declaration submitted with the Complaint in this matter on February 18, 2005.

ANSWER: See the declaration of Richard Stevens attached to EAI’s April 19, 2005 response.

13: Please identify all persons, including but not limited to agents, representatives, contractors or other companies or persons, that have performed survey, audit or inspection work on Entergy’s poles at any time dating back to 1980. Include a statement of the scope of work including but not limited to whether such inspections were conducted for pole or attachment inventory, safety inspection or for some other purpose (specify the other purpose), and whether

invoicing or billing was on a flat fee, per pole, hourly or other basis.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows:

Employees of Entergy Arkansas, Inc. inspect distribution facilities on a daily basis through the course of their job activities. Other inspections and maintenance are performed based on the history of reliability and number of power outages for specific circuits and devices. Specific pole line inspections and restoration and vegetation management are performed primarily by contractors with oversight by management of Entergy Arkansas, Inc. As relating to surveys, audits or inspections of EAI's poles with CATV attachments, EAI identifies Michael F. Bethea Company that performed attachment inventories for EAI. See the declaration of Michael F. Bethea attached to the April 19, 2005 Entergy Response filed in this proceeding. Billing for such attachment inventories by Michael F. Bethea Company was based on a price per attachment. Responding further, EAI identifies USS that has performed safety inspections for EAI relating to CATV attachments. See the declaration of Wilfred Arnett attached to the April 19, 2005 Entergy Response filed in this proceeding. Billing for such safety inspections performed by USS was on an hourly basis with additional charges for overhead-type items.

14: Please identify all attachers, including, but not limited to, telephone companies, telecommunications companies, and cable operators (other than the Complainants in this docket) to which Entergy has issued a denial, either in writing or otherwise, to a request to attach communications facilities to Entergy's poles since January 1, 2001. Please include a statement of the reasons for the denial and whether and under what conditions Entergy eventually

permitted the attachment.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows:

EAI has not issued any unconditional denials to requests to attach communications facilities to EAI's poles since January 1, 2001. Responding further, however, EAI has issued conditional approvals in instances where a third party has sought to attach to one of EAI's poles. In those instances, EAI has required that certain conditions be met (such as make-ready) before the third party could attach. Documents relating to such instances of conditional approval are being produced in response to Request No. 1.

15: Please identify what portion of the total USS survey at issue in this proceeding, audit or inspection costs that Entergy has allocated to incumbent telephone companies in Entergy's service area, including but not limited to Alltel, SBC (now AT&T) and CenturyTel. Please state your answer in terms of both percentages of total costs and actual dollar amounts.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows:

EAI is verifying allocations responsive to this interrogatory and will supplement its answer.

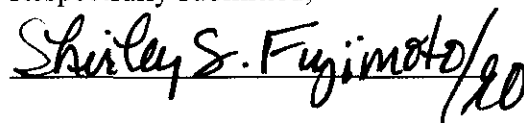
16: Please identify whether Entergy has received payment from any incumbent telephone companies for the USS survey, audit or inspection charges that Entergy has allocated to such

incumbent telephone companies in Entergy's service area as referenced in the preceding interrogatory. Please state the dates and dollar amounts of payments made by each such incumbent telephone companies.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows: Entergy has received no such payment.

Wm. Webster Darling
Janan Honeysuckle
Entergy Services, Inc.
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Little Rock, AR 72201
T: 501.377.5838
F: 501.377.5814

Respectfully submitted,

A handwritten signature in black ink that reads "Shirley S. Fujimoto" followed by a stylized flourish or date "20".

Shirley S. Fujimoto
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Attorneys for Entergy Arkansas, Inc.

Dated: July 20, 2006

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554**

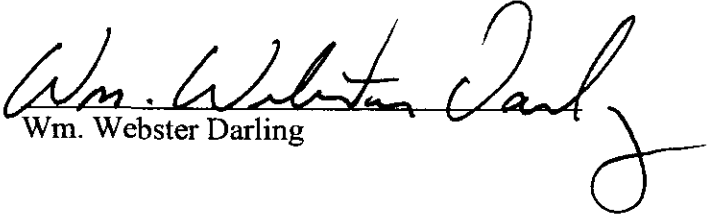
In the Matter of)	
)	
Arkansas Cable Telecommunications)	EB Docket No. 06-53
Association; Comcast of Arkansas, Inc.;)	
Buford Communications I, L.P. d/b/a)	
Alliance Communications Network;)	
WEHCO Video, Inc.; and TCA Cable)	
Partners d/b/a Cox Communications)	File No.: EB – 05 - MD-004
)	
<i>Complainants</i>)	
)	
v.)	
)	
Entergy Arkansas, Inc.)	
)	
<i>Respondent.</i>)	
)	

VERIFICATION

I, Wm. Webster Darling, pursuant to 47 C.F.R. §§ 1.246 and 1.323, hereby declare as follows:

I am an individual over the age of 18 and am employed by Entergy Services, Inc., a subsidiary of Entergy Corporation. I am familiar with the factual matters described in the responses to complainant Arkansas Cable Telecommunications Association's first set of requests for admission and oversaw its preparation. I have reviewed the responses to complainant Arkansas Cable Telecommunications Association's first set of requests for admission and to the best of my knowledge and belief, all the facts stated therein are true and correct.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
July 19, 2006 at Little Rock, Arkansas.


Wm. Webster Darling

CERTIFICATE OF SERVICE

I, Erika E. Olsen, do hereby certify that on this 20th day of July, 2006, a single copy (unless otherwise noted) of the foregoing "Entergy Arkansas, Inc.'s Responses to Complainant Arkansas Cable Telecommunications Association's First Set of Interrogatories" was delivered to the following by the method indicated:

Marlene H. Dortch (hand delivery) (**ORIGINAL PLUS 3 COPIES**)

Secretary
Federal Communications Commission
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Washington, D.C. 20554

Hon. Arthur I. Steinberg (hand delivery, facsimile, e-mail)

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